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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

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7 UNITED STATES OF AMERICA,) Case No.:2:15-mj-01193-NJK
8)
9 Plaintiff,)
10 vs.) STIPULATION TO CONTINUE
11 JAMES WALLACE NOSSAMAN, II,) BENCH TRIAL
12 Defendant.) (First Request)

13 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
14 United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel
15 for the United States of America, and William Terry, Esquire, counsel for defendant, that the
16 bench trial in the above-captioned matter, currently scheduled for May 4, 2016, at the hour of
17 9:00 a.m., be vacated and continued for sixty (60) days or to a date and time convenient to the
18 Court.

19 This stipulation is entered into for the following reasons:

- 20 1. The parties are in the process of negotiating a resolution of the case that would
21 obviate the need for trial. The parties need additional time to do so.
- 22 2. Defendant is out of federal custody and agrees to the continuance.
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1 3. Denial of this request for a trial continuance would prejudice both the
2 Defendants and the Government and unnecessarily consume this Court's valuable resources,
3 taking into account the exercise of due diligence.

4 4. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 5. The additional time requested by this stipulation, is excludable in computing the
7 time within which the defendant must be indicted and the trial herein must commence pursuant
8 to the Speedy Trial Act, 18 U.S.C. § 3161(b) and 3161(h)(8)(A), considering the factors under
9 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

10 6. This is the first request for continuance of the trial in this case.

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12 DATED this 3rd day of May, 2016.

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14 Respectfully submitted,

15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/ William Terry
18 WILLIAM TERRY, ESQ.
19 Counsel for defendant
JAMES WALLACE NOSSAMAN, II

/s/ Nadia Ahmed
NADIA AHMED
Special Assistant United States Attorney

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